

**NOTICE OF SETTLEMENT, STIPULATED DISMISSAL AND MOTION FOR  
PERMANENT INJUNCTION**

Plaintiff Rio Grande Games (“RGG”) and Defendants Joober, Inc. and Adam Joel Oberlander (the “Joobar Defendants”) hereby provide notice that RGG and the Joobar Defendants have reached a settlement of all claims between them. RGG and the Joobar defendants hereby, by and through counsel, stipulate and agree that Plaintiff’s claims against the Joobar Defendants in this litigation are dismissed with prejudice, and the Joobar Defendants’ counterclaims against RGG are dismissed with prejudice, with each party to bear its own costs and attorneys’ fees. RGG and the Joobar Defendants further hereby stipulate to entry of, and respectfully request that this Court enter, the attached Stipulated Permanent Injunction and Dismissal. This stipulation does not affect RGG’s claims against the remaining defendants to this action, nor the Joobar Defendants’ cross-claims against Moses Grossman, Pastel Enterprises, LLC and China Assured, LLC.

SO STIPULATED this 1st day of November, 2018.

By: /s/ Jeffrey T. Norberg

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Attorneys for Defendants Joober, Inc. and  
Adam Joel Oberlander

**Certificate of Service**

I hereby certify that on November 1, 2018, the **NOTICE OF SETTLEMENT, STIPULATED DISMISSAL AND MOTION FOR PERMANENT INJUNCTION**, and [Proposed] Dismissal and Permanent Injunction was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service, upon the following parties and participants:

Aaron Haleva (via ECF)  
*(representing defendants Joober, Inc. and Adam Joel Oberlander)*

Avrom R. Vann, Esq.  
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*(representing defendant Moses Grossman)*

Kyle Seiss  
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*(representing Battery Giant, LLC and Keile Benedikt).*

Pastel Enterprises, LLC  
4 Hummingbird Court  
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China Assured, LLC  
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Dated: November 1, 2018

By      /s/ Jeffrey T. Norberg       
Jeffrey Norberg  
NEAL & McDEVITT, LLC